

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 21-245 (NEB/JFD)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**UNITED STATE'S UNOPPOSED  
MOTION FOR PROTECTIVE ORDER**

MUSE MOHAMUD MOHAMED,

Defendant.

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Kimberly A. Svendsen, Angela M. Munoz, and Allison K. Ethen, Assistant United States Attorneys, respectfully moves the Court for an order protecting the distribution of Rule 16 material in this criminal case pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure.

In support of its motion, the United States alleges and states the following:

The grand jury returned an indictment on November 18, 2021, charging the Defendant with two counts of false declarations before a grand jury, in violation of 18 U.S.C. § 1623. The indictment alleges that the Defendant, while testifying under oath in a proceeding before a Grand Jury of the United States, knowingly made false declarations relating to absentee ballots.

To date, the United States has complied with its discovery obligations and provided the Defendant with its Rule 16 disclosures via electronic discovery. The United States also made a small subset of additional materials available for inspection, and is prepared to

produce those additional materials to the Defendant via electronic discovery. Due to the nature of these additional materials – namely that they contain personal identifiers such as home addresses – the parties agree that a protective order should govern their dissemination. The redaction of these materials would be unduly burdensome for the United States and would hinder the defendant’s ability to meaningful review these specific materials.

Therefore, the United States respectfully requests that this Court enter a Protective Order limiting the dissemination of “Protected Material,” that is, any material containing personal identifiers, including dates of birth, social security numbers, driver’s license numbers, bank account numbers, home addresses, telephone numbers, and any other personal information of non-party individuals.

It is further requested that the Protective Order state: (a) that the Protected Material shall be stored and handled in a manner commensurate with the confidential and sensitive nature of the Protected Material, (b) that the Protected Material shall be held in strict confidentiality by the defendant and defense counsel and may be used only for purposes of this litigation; (c) that defense counsel shall limit the making of copies of the Protected Material to those necessary to their activities as defense counsel in this action; (d) that all individuals having access to these materials shall be informed of the terms of the Protective Order prior to disclosure and shall certify, by signing a copy of the Protective Order, that they have read the terms of the Protective Order and understand that they are bound by these terms; (e) that defense counsel may advise the defendant of the contents of the Protected Material, without providing copies or allowing the copying or retention of any

personal identifying information, subject to the condition that the defendant has read the Protective Order and that he understands and agrees to be bound by its terms; (f) that the use of the Protected Material covered by the Protective Order for any purpose other than the instant litigation shall be deemed a violation of the Protective Order punishable by sanctions; (g) that any filings with the Court that contain Protected Material shall be filed under seal and clearly marked with a legend stating: “PROTECTED MATERIAL ENCLOSED”; and (h) that any documents or other materials containing the Protected Material, and all copies of them, must be destroyed or returned to the Government within sixty (60) days of the conclusion of this litigation.

Dated: April 28, 2022

Respectfully Submitted,

ANDREW M. LUGER  
United States Attorney

*/s/ Angela M. Munoz*

BY: ANGELA M. MUNOZ  
Assistant U.S. Attorney